

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of)
) CC Docket No. 98-170
Truth-In-Billing and Billing Format)

COMMENTS OF U S WEST COMMUNICATIONS, INC.

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COMMENTS OF U S WEST COMMUNICATIONS, INC.

I. SUMMARY AND INTRODUCTION

No reputable business can be against the ideas associated with “truth-in-billing” anymore than comparable ideas reflected in other “truth-in-xxx” initiatives, such as truth-in-lending or truth-in-advertising. Thus, no commenting party is likely to oppose the Federal Communications Commission’s (“Commission”) general ideas around the need for candor in billing, as those ideas are captured in the current NPRM.¹

However, supporting truthful and accurate billing does not necessarily correlate with supporting formal federal regulatory intervention through the rulemaking process as necessary either to assure truthful billing statements or billing formats that accommodate market needs and expectations. Indeed, an integral component in the maintenance of a durable commercial relationship is often found in the ability to accommodate idiosyncratic customer needs not only with respect to fundamental service offerings but the billing for such services, as

¹ In the Matter of Truth-in-Billing and Billing Format, CC Docket No. 98-170, Notice of Proposed Rulemaking, FCC 98-232, rel. Sep. 17, 1998, (“NPRM” or “Truth-in-Billing NPRM”).

well.

U S WEST Communications, Inc. ("U S WEST") prides ourselves on our ability to make such accommodations. We process 12.2 million monthly bills (146.4M annually) without material customer dissatisfaction. We provide different billing mechanisms for our large business customers than for our mass market residential customers. Our small business customers can often choose between large business or residential billing-type arrangements -- whichever best meets their needs.

With respect to our bills, U S WEST feels differently about our bills than some carriers who have spoken about their bills and billing systems before Commission personnel or at Commission-sanctioned events.² U S WEST is proud of our bill, as well as our constituent billing practices on behalf of our own service offerings and those of others.

Our billing activities are driven by customer expectations and desires and reflect the commitment U S WEST brings to maintaining our highly-respected reputation with our customers as well as fostering fair and equitable commercial practices. Not only do we create a bill that is generally pleasing to our customers and reflective of what they have told us they want but we aggressively manage our third-party billing relationships such that our customers are not adversely affected

² For example, the Truth-in-Billing Public Forum held at the Commission's Headquarters on October 23, 1998.

by U S WEST's billing for others.³

U S WEST is convinced that our success in the billing area has been buoyed by minimum regulation associated with our billing activities.⁴ This regulatory minimalism has allowed U S WEST to exercise significant editorial control over the format, look and presentation of our bill with respect not only to our own charges but those of others.

The editorial discretion enjoyed by U S WEST is not only consistent with sound First Amendment and intellectual property values⁵ but with competitive and consumer interest policy, as well. Increasingly a carrier's billing statement will reflect expressive marketing communications and public opinion accommodations. How a carrier bills, the options it provides with respect to access to billing information and the ability to manipulate that information such that bill customization becomes more commonplace are all competitive issues that will play a part in who a customer chooses as his/her supplier. Some companies may bill only for their own services; some for their services and others, as well. Some carriers may give customers the option as to what services they want to have included in their phone bill; others might not. Some might provide greater call detail than

³ See Letter from Solomon D. Trujillo, President & CEO, U S WEST Communications, Inc., to William H. Kennard, Chairman, Federal Communications Commission, dated May 19, 1998 (outlining the various ways in which U S WEST acts to protect its customers against cramming) ("Trujillo/Kennard Letter").

⁴ While certain of our states have regulations regarding billing, those regulations generally do not affect the fundamental format of the bill. The regulations primarily focus on differentiating between regulated and nonregulated services and making clear which services can result in a denial of local service and which cannot.

⁵ A carrier's bill format could be protected by copyright, patent or trademark law.

others; some customers may want only “bottom line” information. But, in all cases, the carrier will be acting in an expressive, communicative fashion in drafting both the look and content of the bill. Deference should be accorded this protected speech activity.

Because the communication of billing information is imbued with both constitutional and competitive significance, the Commission should not enact detailed formatting or bill presentation rules. As discussed more fully below, U S WEST questions the need for any formal rules in this area at all. We believe that industry self-regulatory initiatives, as well as enforcement on an *ad hoc* basis through complaints and Commission-initiated enforcement proceedings, are the more appropriate avenues to pursue.⁶ This is particularly the case since billing language (*i.e.*, service descriptions, order activity, etc.) can run a wide gamut, be different across carriers, be confusing to some individuals, but generally not be unfair or misleading. Those crafting billing speech should be accorded the benefit of the doubt, with those challenging the speech required to prove allegations of unfair or deceptive language. Language prescriptions should not be the order of the day (even in a “safe harbor” model) but should be reserved for remedial situations where demonstrated abuses have been prosecuted.

⁶ Clearly, the Commission would have jurisdiction over an interstate telecommunications carrier’s billing practices, to the extent such practices were alleged to violate the “just and reasonable” requirements of the Communications Act (47 U.S.C. § 201(b)). See *NPRM* n.17 and ¶ 13. Thus, the Commission could regulate in this area through complaint filings or enforcement actions, rather than a formal prescriptive rulemaking.

Should the Commission, however, deem it necessary to establish some type of formal rules in this area, U S WEST believes those rules should remain at the level of “principles.” In crafting the language of the principles, certain of the more general “guidelines” referenced in the NPRM could prove useful, as might some of the language from the industry-crafted Anti-Cramming Best Practices Guidelines.⁷

Finally, in considering the issues raised by the NPRM, the Commission should pay close attention to the system limitations associated with billing matters. In particular, billing systems do have limitations and the older the systems the greater the limitations. Furthermore, most systems do not have the capability to affirmatively capture account change information. That is, while the billing system can capture what occurs on the account each month, which activity might itself reflect a change (i.e., call waiting was added, interexchange carrier (“IXC”) was changed), the systems are not capable of affirmatively advising what last month’s account looked like in comparison to this month’s (i.e., a “stare and compare” approach to capturing and providing billing information). The Commission should avoid enacting any regulations that would require “highlighting” around this type of “change” activity.

⁷ See a discussion of these Anti-Cramming Best Practices Guidelines in the NPRM at ¶ 9 and n.25. And see News Release, “FCC and Industry Announce Best Practices Guidelines to Protect Consumers From Cramming” (“Cramming Press Release”), rel. July 22, 1998 and Statement of William Kennard, July 22, 1998 (hailing the industry-developed “best practices” guidelines to combat cramming as “timely” and “meaningful”) (“Kennard Cramming Statement”).

II. U S WEST IS PROUD OF OUR BILL AND OUR BILLING PRACTICES AND BELIEVES THAT INDUSTRY SELF-REGULATORY INITIATIVES, BUTTRESSED BY TARGETED ENFORCEMENT PROCEEDINGS, PROVIDE SUFFICIENT CONSUMER PROTECTION

A. Bills Reflect Expressive Communications Between Carriers And Their Customers As Well As Material Editorial Decisions

It is U S WEST's experience that bill design and format is more an art than a science. The activity involves working with professionals in the area of print formatting and "plain English" communications, as well as with customer survey and focus groups -- to determine both what changes might be warranted regarding the bill and then whether the changes accomplish the desired objective. Neither of these processes lend themselves to formal regulatory prescriptions. Indeed both highlight the highly editorial nature of bill creation and the First Amendment protections that append to such carrier-customer communications.

Furthermore, it is the reserved editorial control that local exchange carriers ("LEC") retain over their bills that allows them to respond quickly and responsibly to customer complaints and shoddy practices by certain carriers. Today, the local telephone companies are not just friends of the consumer in the battle against cramming⁸ but other misleading or confusing billing practices, as well. It is U S WEST's ability to edit its bill copy that allows us to require changes in service descriptions, carrier identifications, and other text that we believe has the potential or has proven to be confusing. Nothing should interfere with this editorial discretion and its flexible exercise.

⁸ See Kennard Cramming Statement.

B. U S WEST's Easy Bill, Customer Input And Ongoing Reactions

The format of U S WEST's bill is largely the result of a significant bill re-formatting effort which U S WEST began over four years ago.⁹ Through consultation with billing professionals and significant communications with our customers, U S WEST developed our Easy Bill format. Attached to this filing is a brief description of the customer participation that went into the development and design of the bill and some selected verbatim customer comments about the bill format.

The current bill format involves no "separate" bill pages in the sense of separate pieces of paper. Rather, the bill is in a duplex format with front and back printing. Attached to this filing is a representative mock-up of the U S WEST bill in the three formats in which it is currently printed.¹⁰ Those formats are slightly different due to the fact that U S WEST itself is comprised of three former Bell Operating Companies, each of which had its own billing infrastructure. Thus, the billing systems are now referenced as Central, Western and Eastern. Across our region, some variations in the bill format and presentation continue to occur due to these different billing systems. For example, certain portions of the bill will have different names (generally consistent with past labeling practices); bills produced in

⁹ In this regard, we would dispute the Commission's fairly general observation that "[w]hile the nature of the charges appearing on consumers' telephone bills has changed dramatically due to the proliferation of services and service providers, the bills themselves do not seem to reflect this new era." NPRM ¶ 1.

¹⁰ The attachments, unlike the actual printed bills, are reproduced in part through separate pages. The actual printed bills do not have separate pages but run sections into each other, folding out.

one region might carry information monthly, while bills in other regions only carry the information if a “triggering event” occurs; and bills in some regions might identify service providers in front of the call detail and in other regions the name might be after the detail.

The bill generally begins with an Account Summary section which reflects the total amount due and owing each billing entity in the bill.¹¹ Immediately to the right of the entity identification there is a telephone number associated with the entity name, in case a customer wishes to make an inquiry. That page also reflects the customer’s presubscribed carrier (at the facilities level)¹² in any month in which

¹¹ The identification of the billing entity means that the Account Summary information often includes the name of a Billing Aggregator (and maybe the names of two or three such aggregators), a name the customer often does not recognize. While the name of the service provider is generally included on the Billing Aggregator page, the Billing Aggregator/service provider issue is a persistent cause of customer confusion. Additionally, the Commission should be aware that it is not uncommon that a single entity might identify itself differently depending on the service being billed (for example, “AT&T” being a different billing entity than “AT&T 900”).

¹² Considerable customer confusion is generated by the utilization by switchless resellers of their underlying facilities carriers’ Carrier Identification Codes (“CIC”). This situation allows for slamming to occur regardless of Preferred Carrier (“PC”) Protections (such as PC freezes). It also results in the customer’s presubscribed carrier on the front of the bill showing as the facilities-based carrier, even though the Letter of Agency (“LOA”) and subsequent billing pages reflect a carrier of a different name.

U S WEST urges the Commission to act expeditiously to require all carriers to have their own CIC code. See Report and Recommendations of the CIC Ad Hoc Working Group to the North American Numbering Council (NANC) Regarding Use and Assignment of Carrier Identification Codes (CICs), dated Feb. 18, 1998 at ¶¶ 11-12 (observing that the issuance of a separate CIC per carrier would not undermine reasonable numbering conservation efforts and could alleviate problems associated with slamming) and Comments of U S WEST, CC Docket No. 92-237, filed Mar. 6, 1998 in support. And see Reply Comments of U S WEST, Inc., filed Sep. 29, 1997, CC Docket No. 94-129 at 11, n.28. See also Ex Parte letter to Ms. Magalie Roman

there are certain types of account activity.¹³

From the Account Summary section, the bill moves to U S WEST charges for services (both regulated and nonregulated). In this section of the bill, the customer is advised of his/her monthly charges. Additionally, if there was account activity during that month which resulted in a charge being paid to U S WEST (i.e., changes to service through additions, deletions, change of carriers with associated PIC Change charge, etc.), such is reflected in a separate section of the bill.¹⁴ Services for which denial of local service might result are identified separately from those for which no such denial would be appropriate.¹⁵

Salas, FCC, from Elridge A. Stafford, U S WEST dated Oct. 22, 1998. This action alone would alleviate significant customer confusion regarding a customer's actual service provider and attendant billing information.

¹³ In the Central portion of U S WEST's territory, the identification of the presubscribed carrier is provided every month even if no account activity has occurred.

¹⁴ Across U S WEST's territory, this Section has different names ranging from "Order Activity" to "Account Activity" to "Other Charges and Credits."

¹⁵ The Commission makes an assumption around the issue of service denials that might not be entirely accurate. It provides an example of a consumer who fails to pay for paging service and suggests that a local service denial would be inappropriate in response to such nonpayment. NPRM ¶ 24. This is not necessarily the case. Depending on the rules of any particular jurisdiction, local telecommunications services might be denied for nonpayment of other communications services offered by the local provider. And, certainly, as competition increases, carriers will deny any and all services to nonpaying customers, leaving those customers to secure services from other carriers whether the service left unpaid is a telecommunications or non-telecommunications service. That is, a carrier providing a customer with wireless, long distance, voice messaging, Caller ID with associated customer premises equipment ("CPE") and local service (perhaps in a package) will deny the customer access to any/all of the services if any component of the payment obligation goes unpaid. This is clearly the "competitive model" and it should be assumed to be the model on the horizon -- not the traditional model where "local" or "basic" service could only be secured from a

From there, the billing moves to the customer's presubscribed carrier (if U S WEST has a billing arrangement with that carrier). Sometimes the information on the presubscribed carrier bill page is presented to U S WEST in an "invoice-ready" format (which means U S WEST has no technical ability to affect the copy or format). Othertimes, U S WEST is responsible for formatting the bill on behalf of the carrier.

Finally, if the customer has utilized certain miscellaneous telecommunications services (such as dial-around calling or certain operator services) or purchased non-telecommunications services that are telecommunications-related,¹⁶ those billings will also be included in the bill. Often these types of charges appear on Billing Aggregator bill pages. With respect to all of this third-party billing, information is clearly made available to the customer regarding the connection between the charge and the potential for service disconnection. At least in U S WEST's case, this is true not just with respect to 900 services but other "non-telecommunications" services as well (such as Internet access services).

Since U S WEST adopted the Easy Bill format, customer complaints about the bill format have become negligible. For example, from January to September of 1998, only .67% of total customer complaints involved the bill format (and even with respect to these complaints, there is some question whether some of the complaints

single service provider and could therefore not be disconnected for nonpayment of certain services.

actually were correctly logged as “format” complaints). The largest number of customer complaints around billing matters in general has to do with third-party toll charges on the bill. There are also complaints involving other items on the bill, including 900-type billings and surcharges, and bill payment processing issues.

Thus, it is clearly U S WEST’s experience that our bill format is not the source of material confusion or deception *vis-a-vis* our customers. Quite the contrary. For this reason we would much prefer targeted enforcement regulatory intervention to any type of rulemaking activity. Carriers with good track records should not have to suffer regulatory interference with their commercial operations because particular entities act in an unfair or deceptive fashion.

III. THIS PROCEEDING SHOULD BE TERMINATED, DESPITE ITS WELL-INTENTIONED FOUNDATION

A. The NPRM Inappropriately Implicates The Totality Of U S WEST’s Billing Practices

The Commission’s Truth-in-Billing NPRM implicates U S WEST’s (as well as other LEC) billing from two perspectives: (1) U S WEST’s acting in our own right as a service provider, billing for our own products and services;¹⁷ and (2) U S WEST’s acting as a billing agent for carriers providing interstate telecommunications services and service providers offering services that are not telecommunications services but related services. While in some respects the concepts associated with each function might be similar, the jurisdictional

¹⁶ U S WEST only bills for telecommunications-related non-telecommunications services. See Trujillo/Kennard Letter.

¹⁷ See NPRM ¶¶ 6, 9.

foundation for federal regulatory action is materially different and these differences must be kept in mind.

The Commission undoubtedly has jurisdiction over the billing practices of common carriers providing interstate telecommunications services.¹⁸ However, its jurisdiction over LEC billing for local exchange services is less obvious. While it might be the case that federal mandates imposed on interstate carriers could find their way through to the overall bill format devised by a LEC, such would be the result of a voluntary editorial determination, rather than adherence to a federal regulatory mandate.

Given the questionable nature of the Commission's jurisdiction over the local exchange bill with respect to local exchange services, the Commission should take a more reserved approach than is proposed in the NPRM. To the extent it believes that certain billing for interstate carriers is misleading, it should focus on that particular problem and work with the carriers, preferably informally, to come to a satisfactory resolution of the matter.

B. Federal Regulatory Intervention Should Be Kept To A Minimum

1. Industry Initiatives are Preferable to Commission Rules

It is unclear that federal regulatory intervention in the matter of the bill presentation of all carriers is appropriate as a matter of policy, even if the requisite jurisdiction pertained. Convening an industry working group to address whatever problems the Commission believes currently exist would be calculated to produce

¹⁸ Id. ¶¶ 12-13.

greater consensus in a shorter period of time than a formal, potentially prescriptive rulemaking, and would assure continued flexibility and editorial accommodation.¹⁹

A formal proceeding, along the lines currently being pursued by the Commission, is undoubtedly likely to raise the specter of those areas in which significant caution must be exercised (i.e., exceeding the bounds of appropriate federal regulatory jurisdiction and overstepping First Amendment protections), rather than focus on those areas where voluntary industry cooperation might lead to more effective and reliable results. For these reasons alone, the formal proceeding should be terminated.

2. Prescription by Principles

However, if the Commission determines to proceed with formal rules, such

¹⁹ Throughout the NPRM, as well as the separately-issued statements of the various Commissioners, it is never clear why the Commission determined to proceed to a formal rulemaking proceeding on the matter of bill presentation, rather than to attempt to address the matter through industry self-regulatory initiatives, such as those which took place with respect to the establishment of the Anti-Cramming Best Practices Guidelines. The most that is provided by way of explanation is that the Guidelines were focused on a LEC's relationship between it and those unaffiliated entities for whom it bills, while the instant NPRM focuses on end-user customers. See NPRM ¶ 9. But this seems to be a difference without a meaning since the Anti-Cramming Best Practices Guidelines were clearly crafted as pro-consumer (i.e., end user) protections and cramming affects the end user's billing experience. Id. ¶ 3. And see Cramming Press Release ("These voluntary industry guidelines should go a long way towards weeding out the bad actors in the telecommunications industry by cutting off access to billing services to those engaged in unfair or deceptive marketing, **and providing consumers the ability to recognize and challenge improper charges before they make any payment.**" (bold added)). Compare Testimony of Common Carrier Bureau ("CCB") Chief Larry Strickling and United States Telephone Association ("USTA") President Roy Neel, before the Senate Governmental Affairs Subcommittee on July 23, 1998 (both asserting that self-regulatory guidelines were the preferable way to go for the time being).

rules should be crafted in the manner of “principles.” For example, the “guidelines” identified by the Commission in its NPRM and the associated Press Release might be appropriate -- if adopted solely at the “guideline” level and if modified slightly.

U S WEST would have less problem with formal Commission rules that required that “Telephone bills should be clearly organized and should identify new charges to consumers services,”²⁰ should contain “non-misleading descriptions of all charges and identifications of service providers responsible for such charges,”²¹ and “should contain clear and conspicuous disclosure of information necessary to make inquiries about charges on their bills,”²² than more detailed rules that might require a separate summary section to a bill or a section that highlighted changes in service since the last billing and required separation (as a matter of regulatory fiat) of categories of service.²³ While the former approach sets the proper consumer

²⁰ This is a modification of the Commission’s first proposed guideline as identified in the Press Release and the NPRM (§§ 10 and 19). The modification consists of eliminating the notion of “highlighting” and of identifying “changes” to consumers services on the bill.

²¹ This principle (as identified in the Press Release and the NPRM at § 10) has been modified by removing the requirement of a “full” description, since -- as addressed further below -- U S WEST believes that “full service descriptions” are often better conveyed in fulfillment communications or through other vehicles than bill text which is often constrained by character limitations, as well as customer desires for “shorter, simpler” bills.

²² This is the third principle or guideline identified in the Press Release and in the NPRM (at § 10). U S WEST would leave the principle as written above and not require that carriers provide a telephone number for customers to call with “complaints” (see id. § 10). Carriers should be permitted to phrase the need for the call in a more affirmative manner (i.e., “call xxx if you have questions, comments or other inquiries about this bill”).

²³ All these proposals are incorporated in the brief discussion under the first proposed guideline. See Press Release, Report No. CC 98-28.

protection and fairness tone, the latter unduly interferes with protected carrier editorial decisions and management prerogatives.

Furthermore, should the Commission determine that it needs to go further than the three fairly simple guidelines outlined in the Truth-in-Billing NPRM, it might require (similar to the existing industry self-regulatory Cramming Guidelines) that carriers develop and deploy

- “procedures for comprehensive advance screening of products being charged to local telephone bills”²⁴ by interstate carriers,
- “telephone company scrutiny of service providers, [and] verification of end user approval of services charged to their bill,”²⁵
- and “customer dispute resolution procedures.”²⁶

Similarly, principles requiring that bills

- be presented in an understandable format using nonmisleading language;
- and make clear those services regarding which nonpayment could affect the provision of other services,

might also be of a type appropriate for regulatory prescription.

Principles crafted at this level of prescriptive detail should not have an unduly adverse impact on existing carrier billing practices nor interfere with the development of new telecommunications services/packages and the billing associated with them. Nor would they interfere with the ability to craft ongoing

²⁴ Cramming Press Release.

²⁵ Id. Absent a contractual agreement between the parties to the contrary, this type of service verification should be expected to be done by the service provider not by the billing entity.

²⁶ Id.

“solutions” as new problems or customer satisfaction issues present themselves. Finally, such principles are not so detailed (i.e., “every carrier bill must include a ‘summary billing’ section”) so as to unduly interfere with existing billing systems (and their limitations), billing practices of different telecommunications carriers (i.e., local, interexchange carrier (“IXC”) or Commercial Mobile Radio Services (“CMRS”), or carrier editorial discretion.

3. Bill Content Should Carry a Presumption of Lawfulness

Communications between carriers and their customers should be accorded a general presumption of lawfulness. That is, carriers must be granted considerable leeway in their communications with their customers with the assumption generally being that their speech is not false or misleading. There are many different ways in which to describe a single service or a transaction. Those differences do not, however, necessarily suggest that one way of speaking is accurate and another misleading. Those who argue that carrier identifications or service descriptions are unfair or misleading should bear the burden of demonstrating such is the case. This approach is consistent not only with First Amendment principles but with the type of targeted regulatory intervention that Commissioner Powell has repeatedly argued is most consistent with the movement to a competitive environment.²⁷

²⁷ See, e.g., Remarks (as prepared for delivery) by Commissioner Michael K. Powell before PCS '98, Sep. 23, 1998 at 3; and see Comments of the United States Telephone Association, CC Docket No. 96-262, et al., filed Oct. 26, 1998 at 34 quoting to Commissioner Powell's statement to the Personal Communications Industry Association, Orlando Florida, Sep. 23, 1998.

4. Use of Common Terminology and Bill Formats

U S WEST believes it critical for the Commission to articulate that differences in bill formats and nomenclature are not bad. Common service terms and descriptions are not necessarily required and might actually operate to depress the ingenuity and innovation associated with competition. This could be an even more significant problem if “standardization” got in the way of “easy to do business with” billing for the inevitable new telecommunications technologies and service offerings, both stand-alone and in packages, that carriers will be developing. Additionally, the “look” of bills will change as a matter of ongoing accommodation to new customer needs and billing issues.

As a matter of fact, there will remain differences in carriers’ bills and as customers move from geography to geography or carrier to carrier those differences will be realized. Often, those differences will play a role in a customer’s determination of which provider it wishes to patronize. Indeed, the bill itself will increasingly become a part of the weaponry in the competitive arsenal of the service providers.

Thus, while there might be some generalized desire from both regulators and some members of the public for “common” service descriptions or common billing terms (not unlike the generalized desire for commonality across voice messaging systems or voice response units), there must be regulatory cognition of the fact that the bills being rendered to the public are being rendered by private companies not government bureaucracies. It is extremely unlikely (especially in the absence of industry-driven initiatives) that the level of commonality (or standardization) the

Commission might like to see will materialize. This is particularly true in a competitive environment where differences between or among billing formats (like differences in voice messaging systems) might represent cutting-edge competitive differentiators.

While the lack of uniformity might be confusing to some customers, that confusion -- in and of itself -- is not sufficient to cause the format or the language to be deemed unfair, unreasonable, misleading or deceptive. To the extent the consumer has the ability to clarify the billing issue and remove the confusion, it is not unreasonable to expect a certain level of “self-help.”

An example from another industry should help in clarifying this matter. A customer goes to a retail establishment and purchases a package of men’s socks for \$15.95. Depending on the store and the register where the customer paid for the merchandise, the subsequent billing statement might read: Men’s Apparel, Men’s Hosiery, Sundries, Men’s Suits, Men’s Casual Wear or Women’s Cosmetics. If the person paying the bill is the same person who purchased the socks, whatever service “description” is provided will, along with the \$15.95 price, trigger in the mind of the bill payor what the commercial transaction involved, even though only a single service description is factually accurate (i.e., Men’s Hosiery) and at least two of them could be considered “misleading” (i.e., Men’s Suits (associated with a \$15.95 item) and Women’s Cosmetics). If the person paying the bill is not the person who made the purchase, there might be no factual comprehension (let alone confusion) about the billing because the individual would have no knowledge whether what was purchased was Women’s Cosmetics, Sundries or something

associated with Men's Apparel. The only billing description that might cause "confusion" for the bill payor in this situation might be a transactional description of "Men's Suits" associated with a \$15.95 item. This confusion might get resolved by the bill payor discussing the transaction with the buyer or through a call to the store for clarification.

Bottom line, there are many ways to describe a commercial transaction. Unfairness and deception are matters that can only be -- and must be -- assessed in a factual context, not in the abstract. For this reason, the Commission should not blanketly assert that any particular description or language is "misleading." Rather, it should make such assessments on a case-by-case basis, where decisional precedents then become available to educate future conduct.

5. Systems Issues Must be Accommodated

Incumbent billing systems often lack the flexibility necessary to make billing format changes easily or quickly. Additionally, even where the billing systems support a quality bill format (such as in U S WEST's territory), there could be variations in the formatting due to system differences within the carrier itself resulting from prior independent operations, mergers, etc. Furthermore, billing systems might well be different even between different operating divisions of a single carrier, e.g., landline and wireless services might utilize different systems. These systems issues must not be minimized because they are relevant to both the customer experience and the feasibility of "quick and easy" billing changes.

The systems that produce the current customer bills reflect the customer "billing experience." To the extent that experience is positive (or at least not

negative), the “I’m used to it” aspect of the billing experience is something that a company might not want to change even if it were able to do so. Furthermore, since the capability of a billing system to accomplish a particular result is the critical factor in being able to deploy a specific regulatory mandate, an understanding of the complex interaction between the ordering and billing systems, as well as the billing systems and other systems, is critical. This is especially true since there really is no such thing as a “change to the billing system” and no such cost containment.

For example, U S WEST produces around 12.2 million bills a month. The billing information to populate the bill comes from seven different account centers. There are three primary billing systems across our territory. A single billing change involves manipulation of lines of code for each of those systems, in addition to re-coding of the bill formatting database itself. Additionally, around 30 different databases interact with the three primary billing systems and changes to the primary billing systems involve changing the interfaces to all of these other databases. Thus, billing changes involve large, complex database changes and interactions that require advance design, coding and testing. This complexity must not be ignored.

Thus, the Commission must be sensitive to the limitations inherent in the billing infrastructure. It must assess the costs associated with any proposed billing format requirements (said costs not being quantifiable in the absence of knowledge of the specific proposed requirement) with the benefit to the public of requiring the change. It must also permit sufficient time for any required system modifications to

be deployed. Such changes do not occur quickly but require substantial lead time.

Particularly in the area of “service” or “charge” “descriptions,” the Commission must appreciate the “character” limitations associated with such descriptions. There is no ability to provide a lengthy description of what is involved in the offering. And, a compelling argument can be made that such descriptions would work totally contrary to customers’ desires for “simpler, shorter” bills. For that reason, U S WEST works hard on our own behalf and working with other providers to utilize descriptions that capture the essence of the offering in a manner calculated to convey maximum information. That such is not always accomplished does not mean that carriers are acting to mislead. Rather, it simply reflects the trial and error that is part and parcel of billing communications.

To the extent the Commission -- or any other regulatory entity -- believes that services require more elaborate descriptions than can be accommodated on billing pages or that carrier surcharges require greater explanation than can be accomplished through a charge description (i.e., Access Fee, Universal Service Fee, etc.), then regulatory agencies should work with carriers to provide those descriptions through vehicles other than, or in addition to, the bill. Sometimes additional information can be provided through a “market message” on the carrier’s bill page.²⁸ Other times, service fulfillment and customer education vehicles will be

²⁸ A market message provides carriers with a substantial amount of space in which to communicate with their customers. However, the Commission should be advised that -- at least under the terms of the U S WEST contract -- editorial control over the message ultimately is lodged with U S WEST, not the carrier for whom the billing is being done. Additionally, market messages are only useful for conveying information to all customers of a carrier. That is, messages cannot be edited or

better suited for descriptions of complex regulatory proceedings and consequent charges.

IV. SUBSTANTIVE COMMENTS ON SPECIFIC NPRM ITEMS

U S WEST herein comments briefly on just a few of the specific proposed NPRM items. **First**, we want to stress the need for cost recovery to the extent the Commission requires interstate carriers to comply with any federal mandates associated with bill format or bill presentation. To the extent the Commission imposes obligations on interstate carriers with respect to their billing obligations, the Commission should make clear that the obligations run to the carrier not the billing agent per se. That is, the Commission should make clear that the interstate carrier is saddled with the regulatory obligation. If it bills on its own behalf, it should comply. If it bills through an agent, it should comply.

A LEC is solely a billing agent for an interstate carrier. Any billing obligations imposed on the interstate carrier accomplishable through a billing agent should assure cost recovery by the agent either directly through the regulation or by making clear that the agent has no independent obligation. By making clear where the regulatory obligation fundamentally lies, the Commission will increase the clarity around the cost-recovery issues associated with changes in bill format.²⁹

sorted in such a fashion so as to only reach a certain population of the customer base.

²⁹ When implementing some of the Commission's 900 services billing rules, some interstate carriers took the position that the obligation ran to the billing entity rather than the transporting carrier or service provider. Thus, those carriers argued that the costs associated with the billing changes should be borne by the billing entity/agent. Of course, this was not correct then and it would not be now.

Second, we appreciate that it could be helpful to a consumer to have a phone number associated with every service provider. We believe, however, that the telephone number should not necessarily be that of the service provider itself (or its administrative offices) but should be a number that can handle inquiries on behalf of the service provider and provide customer resolution of disputes. Thus, for example, where such function is handled by a Billing Aggregator, it is possible that each service provider identified on that Billing Aggregator's page might provide the same telephone number (i.e., that of the Billing Aggregator). Still, we think this is the most pro-consumer approach. Providing a phone number directly connected to the service provider when the provider does not handle its own inquiry function only increases the likelihood that the customer will make an unnecessary call in the first instance and feel more like he/she received the run around.

U S WEST would, however, support a rule that required Billing Aggregators to have information in their possession regarding phone numbers and addresses of the service providers for whom they bill (i.e., administrative information) in case a consumer does want such information even after being informed that the service provider will probably not have a great deal of information about the individual to engage in a meaningful discussion.

V. CONCLUSION

For all of the above reasons, U S WEST believes the Commission should terminate the existing proceeding and convene an industry Task Force or Working

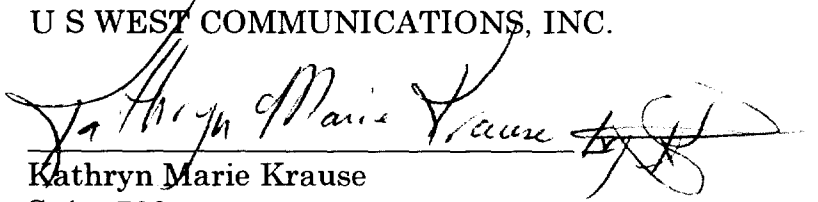
However, the Commission can alleviate some of the contention around the matter by making clear the entity actually burdened by the regulatory mandate.

Group to address the issues outlined in the instant NPRM. Such an approach is much preferable to the adoption of formal regulatory mandates around the format or content of the bill. However, to the extent the Commission believes it must take some formal action, promulgated rules should not go beyond general principles or guidelines as such principles have been articulated in the Commission's Truth-in-Billing Press Release or NPRM.

Respectfully submitted,

U S WEST COMMUNICATIONS, INC.

By:


Kathryn Marie Krause
Suite 700
1020 19th Street, N.W.
Washington, DC 20036
(303) 672-2859

Its Attorney

Of Counsel,
Dan L. Poole

November 13, 1998

U S WEST EASY BILL

The U S WEST Easy Bill was designed in direct response to customer demand for a telephone bill which was less wasteful and easier to manage than the existing U S WEST bill. Development of the bill began in January 1993 with exploratory research and concluded with regional deployment to all residential customers in September 1996. (The bill was also deployed to small business customers in 1997.) Easy Bill was developed using a systematic development and research approach, similar to that used with other new products.

1. Bill Format Qualitative Research - Jan - March 1993

- Six focus groups with residential customers in Phoenix and Omaha to explore ways to make the bill easier for customers.

Findings: "The one-page bill was the most well received bill enhancement evaluated. This concept should be developed further. It is a radical departure from the current bill and the customer response was very enthusiastic."

2. New One-Page Bill Research - Aug - Sep 1993

- Quantitative research with 174 residential customers throughout the U S WEST region to quantify customers' interest in the concept of the one-page bill and to obtain their evaluation of a prototype one-page bill which had been mailed out to them.

Findings: "The majority of customers liked the ease and convenience the new bill would provide, particularly that it would be easier to read. Impact on the environment (less waste) is also a salient benefit customers associate with the new bill."

3. Easy Bill Evaluation (Post Market Trial) - Oct 1995

- Quantitative research with 302 residential customers who were in the Arizona market trial and had been receiving the Easy Bill for several months.

Findings: "The new Easy Bill format is preferred by the majority of customers (74%) over the old bill format. They believe the bill is easier to read with fewer pages and is easier to use."

4. Easy Bill Evaluation (Post Regional Deployment) - Nov 1996

- Quantitative research with 255 residential customers throughout the 14-state U S WEST region who had received the Easy Bill for several months.

Findings: "Nine out of ten (91%) respondents state they are very or somewhat satisfied with the new bill . . . More than two-thirds (70%) rate the bill 'better than' the previous bill format . . . Residential customers liked the fact that the Easy Bill is easier to read and understand, and that it saves paper. Other 'likes' cited included comments about the organization of the content, and the size/shape of the bill.

5. Easy Bill Evaluation (Post Market Trial with Small Business Customers) - Dec 1996

- Quantitative research with 155 Small Business Customers who were in the Western Region market trial and had been receiving the Easy Bill for several months.

Findings: "Satisfaction with the new Bill was high as more than nine out of ten (94%) reported that they were 'very' or 'somewhat' satisfied . . . Almost three quarters (73%) of the small business customers said the new Bill format was 'better than' the previous one . . . A majority found the new format easy and convenient. Many liked that paper was saved."

Easy Bill is now the standard bill format for all residential and small business customers. Easy Bill - Phase II has also been deployed to all of the large business customers in U S WEST.

CUSTOMER QUOTES ABOUT EASY BILL

COMMUNICATIONS TEST ON CONDENSED BILL & INSERT - October 1994

"I think this wonderful really. It's so much easier, the bill. I can't understand why they didn't do it before. It's so much nicer."

"I think it's an improvement, definitely. You don't have to shuffle pages. The header page gives you the individual breakdown and anything you want to question is on the back sheet."

"The less papers I have to shuffle to look for things, the easier it is."

REVISED CONDENSED BILL - March 1995

"It's easy to follow all on one page."

"It's easier to read, less confusion, less frustration. It frustrates me to spend extra time to decipher a bill when it should be simple."

CONDENSED BILL EVALUATION: Small Business Bill Payers - February 1996

"I like it better than the bill we have now. It's less paper, it's not as bulky. I can see exactly what I owe. The phone number is right there if you have any questions."

"I like that all the pertinent information that I want to know first and foremost is all right there in the box on the first page."

Eastern

U S WEST COMMUNICATIONS

http://www.uswest.com

CHARLES EASTERN

Bill Date: Dec 16, 1999

Account No: 402-865-3093-123R

U S WEST COMMUNICATIONS

For questions, call 1-800-244-1111

Page 2

Balance Forward	New Charges	Total Amount Due	Due Date for New Charges
\$.00	\$109.14	\$109.14	Jan 7, 2000

Account Summary

▼ Previous Balance

Charges	32.59
Payment	32.59
Balance Forward	\$.00

Thank you for your payment

▼ New Charges

U S WEST Communications	1-800-244-1111	34.95
Presubscribed Carrier Inc.	1-800-253-1289	12.24
Diamond Communications	1-800-878-1234	23.05
Club Communications Spec Serv	1-800-895-7865	38.90
Total New Charges		\$109.14

For questions, call:

TOTAL AMOUNT DUE **\$109.14**

We appreciate your business.

The company you have chosen for interLATA calls (long distance calls outside your local toll calling area) is PRESUBSCRIBED CARRIER INC.

The company you have chosen for intraLATA calls (long distance calls inside your local toll calling area) is U S WEST COMMUNICATIONS

U S WEST's automatic Payment Plan is dependable and convenient. It saves time and money! Sign up for this free service today! For more information please call 1-800-244-1111 for residential, or 1-800-603-800 for business.

▼ LOCAL CHARGES

MONTHLY SERVICE-MMM dd THRU MMM dd	17.70
PFX-LINE	
BASIC SERVICES	
<i>These services are necessary for you to use your telephone.</i>	
RESIDENCE LINE	13.85
OPTIONAL SERVICES	
<i>These services are provided at your request and are not required as part of your basic telephone service.</i>	
CALL WAITING	4.85
FEDERAL ACCESS CHARGE	3.50
OTHER CHARGES AND CREDITS	10.00
TAX-FED 1.16 STATE 2.69	3.75

U S WEST COMMUNICATIONS LOCAL CHARGES **34.95**

OTHER CHARGES AND CREDITS

ITEM	PER MONTH
DEC 10	
ONE-TIME CHARGE FOR	
1. CHANGE OF LONG DISTANCE COMPANY OUTSIDE THE LOCAL TOLL CALLING AREA	5.00
2. CHANGE OF LONG DISTANCE COMPANY INSIDE THE LOCAL TOLL CALLING AREA	5.00
TOTAL OTHER CHARGES AND CREDITS	10.00

NOV 13 '98 12:44PM U S WEST

ITEMIZED CALLS

	NO	TIME	PLACE	AREA - NUMBER	TYPE	MIN	
DEC 05	1	851PM	TO OVERLANDPK	KS 913 831 - 1133	E	3	.29
DEC 10	2	1121AM	TO ST LOUIS	MO 314 862 - 6183	N	27	2.57
DEC 12	3	502PM	TO LADUE	MO 314 432 - 0280	E	28	2.86
DEC 13	4	1110AM	TO ST LOUIS	MO 314 725 - 0433	D	3	.29
			(SUBTOTAL			5.01)	

MISCELLANEOUS CHARGES AND CREDITS

NO	ITEM	TAX CODE	
MM DO 5	MONTHLY CHARGE	A	4.90
	(MISCELLANEOUS CHARGES AND CREDITS SUBTOTAL		4.90)

Type of Long Distance Calls:
 D-DAY
 N-NITE/WKEND

E-EVENING

T-TAX RATE APPLIED: A-3.00%

TOTAL ITEMIZED CALLS 10.00

TAX- FED 1.44 1.44

TOTAL PRESUBSCRIBED CARRIER INC. CHARGES (INCL TAX) 12.24

THIS PORTION OF YOUR BILL IS PROVIDED AS A SERVICE TO PRESUBSCRIBED CARRIER INC.
 THERE IS NO CONNECTION BETWEEN U S WEST COMMUNICATIONS AND PRESUBSCRIBED CARRIER INC.

ITEMIZED CALLS

NO.	TIME	PLACE	AREA - NUMBER	TYPE	MIN	
ABC TELEPHONE SERVICES						
DEC 05	1.	851PM	TO OVERLANDPK KS 913 831-1139	E	3	.29
DEC 10	2.	1121AM	TO ST LOUIS MO 314 882-8108	N	27	2.57
PDD PHONE SERVICE						
DEC 03	3.	1256PM	TO ST LOUIS MO 314 725-0433	D	3	.29
DEC 06	4.	628PM	TO INDEPENDENCE MO 816 478-4586	E	37	3.52
DEC 12	5.	502PM	TO LADUE MO 314 432-0288	E	28	2.86
DEC 13	6.	1118AM	TO ST LOUIS MO 314 725-0433	D	3	.29
					(SUBTOTAL	8.82)

MISCELLANEOUS CHARGES AND CREDITS

NO.	ITEM	TAX CODE	
ABC TELEPHONE SERVICES			
MMM DD 7	MIN USE FEE	A	4.86
PDD PHONE SERVICE			
MMM DD 8	MONTHLY CHARGE	A	4.99
(MISCELLANEOUS CHARGES AND CREDITS SUBTOTAL		8.05)	

Type of Long Distance Calls:
D-DAY
N-NITE/WKEND

E-EVENING

T-TAX RATE APPLIED- A-3.00%

TOTAL ITEMIZED CALLS 18.97

TAX- FED 4.30 4.30

TOTAL DIAMOND COMMUNICATIONS CHARGES (INCL TAX) 23.83

THIS PORTION OF YOUR BILL IS PROVIDED AS A SERVICE TO DIAMOND COMMUNICATIONS.
THERE IS NO CONNECTION BETWEEN U S WEST COMMUNICATIONS AND DIAMOND COMMUNICATIONS.

THESE CHARGES ARE FOR NON TELECOMMUNICATIONS SERVICES AND PRODUCTS.
NEITHER LOCAL NOR LONG DISTANCE SERVICES CAN BE DISCONNECTED FOR
NONPAYMENT OF THESE CHARGES. SPECIALIZED SERVICES PROVIDERS MAY
EMPLOY OTHER AGENCIES TO COLLECT DELINQUENT SERVICES AND PRODUCTS
CHARGES, EVEN IF PREVIOUSLY ADJUSTED FROM YOUR BILL.

SPECIALIZED SERVICES AND PRODUCTS

MISCELLANEOUS CHARGES AND CREDITS

NO.	ITEM	
DEC 01 1.	WWW SERVICES	18.95
DEC 01 2.	WEBSITE	19.95
(MISCELLANEOUS CHARGES AND CREDITS SUBTOTAL		38.90)

Type of Long Distance Calls:

D - DAY

E - EVENING

TOTAL SPECIALIZED SERVICES AND PRODUCTS 38.90

TOTAL CLUB COMMUNICATIONS CHARGES 38.90

THIS PORTION OF YOUR BILL IS PROVIDED AS A SERVICE TO CLUB COMMUNICATIONS
THERE IS NO CONNECTION BETWEEN U S WEST COMMUNICATIONS AND CLUB COMMUNICATIONS.

Central

USWEST COMMUNICATIONS @

http://www.uswest.com

SAM CENTRAL
Bill Date: Dec 16, 1999
Account No: 801-965-3093-123R

USWEST COMMUNICATIONS @

For questions, call 1-800-244-1111

Page 2

U S WEST COMMUNICATIONS LOCAL CHARGES
ITEMIZED MONTHLY SERVICE

BASIC SERVICES

These services are necessary for you to use your telephone.

1 RESIDENCE LINE 13 21

OPTIONAL SERVICES

These services are provided at your request and are not required as part of your basic telephone service.

1 NON-PUBLISHED SERVICE 1 90

TOTAL 15.11

MONTHLY SERVICE

MONTHLY SERVICE - DEC 16 THRU JAN 15

15.11

FEDERAL ACCESS CHARGE

3.50

911 EXCISE TAX

.31

SUBTOTAL \$18.92

ACCOUNT ACTIVITY

1 CHARGE FOR CHANGE OF LONG DISTANCE COMPANY OUTSIDE 5 00

THE LOCAL TOLL CALLING AREA ON 12-18-99

2 CHARGE FOR CHANGE OF LONG DISTANCE COMPANY INSIDE 5 00

THE LOCAL TOLL CALLING AREA ON 12-23-99

SUBTOTAL \$10.00

LONG DISTANCE

NO.	DATE	TIME	TO PLACE	TO AREA NUMBER	TYPE	MINUTES	AMOUNT
1	DEC 02	12:00P	AMERCN FORK UT	801 758-0924	D	31	4.49
2	DEC 08	3:10P	MONROE UT	801 527-3823	D	1	.19
SUBTOTAL							\$4.68

TAX SUMMARY

FEDERAL EXCISE TAX

.66

STATE TAX

1.29

SUBTOTAL \$1.95

U S WEST COMMUNICATIONS LOCAL CHARGES \$35.55

Balance Forward	New Charges	Total Amount Due	Due Date for New Charges
\$0.00	\$189.10	\$189.10	Jan 7, 2000

Account Summary

Previous Balance

Charges 32.59

Payment Thank you for your payment 32.59^c

Balance Forward \$0.00

New Charges

For questions, call:

U S WEST Communications 1-800-244-1111 35.55

Presubscribed Carrier Inc. 1-800-253-1289 12.24

Diamond Communications 1-800-678-1234 20.59

Club Communications 900 1-800-895-7865 130.72

Total New Charges \$199.10

TOTAL AMOUNT DUE \$199.10

We appreciate your business.

The company you have chosen for interLATA calls (long distance calls outside your local toll calling area) is PRESCRIBED CARRIER INC.

The company you have chosen for intraLATA calls (long distance calls inside your local toll calling area) is U S WEST COMMUNICATIONS

U S WEST's automatic Payment Plan is dependable and convenient. It saves time and money! Sign up for this free service today! For more information please call 1-800-244-1111 for residential, or 1-800-603-600 for business.

NOV 13 '98 12:46PM US WEST

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ITEMIZED CALLS

NO.	DATE	TIME	TO PLACE	TO AREA NUMBER	TYPE	MINUTES	AMOUNT
1	DEC 05	6:51P	OVERLANDPK KS	913 631-1133	E	3	.28
2	DEC 10	11:21A	ST LOUIS MO	314 862-6109	N	27	2.57
3	DEC 12	5:02P	LADUE MO	314 432-0280	E	28	2.88
4	DEC 13	11:10A	ST LOUIS MO	314 725-8433	D	3	.28
SUBTOTAL						5.81	

MISCELLANEOUS CHARGES AND CREDITS

NO.	DATE	ITEM	TAX CODE	AMOUNT
5	DEC 12	MONTHLY CHARGE	81	4.98
SUBTOTAL				4.98

PRESUBSCRIBED CARRIER INC. SUBTOTAL OF ITEMIZED CALLS \$10.88

TAX SUMMARY

FEDERAL EXCISE TAX	.32
STATE TAX	.25
CITY TAX	.68
COUNTY TAX	.03
PRESUBSCRIBED CARRIER INC. SUBTOTAL OF TAXES	\$1.44
PRESUBSCRIBED CARRIER INC. CURRENT CHARGES	\$12.24

Type of Long Distance Calls:

D - Dial Day - Full Rate

E - Dial Evening - Discount Rate

N - Dial Night - Discount Rate

Tax Code Explanation:

01 - State and Local Tax Applied

THIS PORTION OF YOUR BILL IS PROVIDED AS A SERVICE TO
PRESUBSCRIBED CARRIER INC. THERE IS NO CONNECTION BETWEEN
PRESUBSCRIBED CARRIER INC. AND U S WEST COMMUNICATIONS.

ITEMIZED CALLS

NO.	DATE	TIME	TO PLACE	TO AREA NUMBER	TYPE	MINUTES	AMOUNT
ABC TELEPHONE SERVICES							
1	DEC 05	6:51P	OVERLANDPK KS	813 631-1133	E	3	.28
2	DEC 10	11:21A	ST LOUIS MO	314 882-8108	N	27	2.57
						SUBTOTAL	2.86
PDQ PHONE SERVICE							
3	DEC 03	12:59P	ST LOUIS MO	314 725-0433	D	3	.29
4	DEC 08	6:29P	INDEPNONCE MO	818 478-4585	E	37	3.52
5	DEC 12	5:02P	LADUE MO	314 432-0280	E	28	2.86
6	DEC 13	11:10A	ST LOUIS MO	314 725-0433	D	3	.29
						SUBTOTAL	6.78

MISCELLANEOUS CHARGES AND CREDITS

NO.	DATE	ITEM	TAX CODE	AMOUNT
ABC TELEPHONE SERVICES				
7	DEC 08	MIN USE FEE	01	4.08
PDQ PHONE SERVICE				
8	DEC 12	MONTHLY CHARGE	01	4.58
			SUBTOTAL	8.66

DIAMOND COMMUNICATIONS SUBTOTAL OF ITEMIZED CALLS **\$18.67**

TAX SUMMARY

FEDERAL EXCISE TAX	.80
STATE TAX	.23
CITY TAX	.88
COUNTY TAX	.03
DIAMOND COMMUNICATIONS SUBTOTAL OF TAXES	\$1.94
DIAMOND COMMUNICATIONS CURRENT CHARGES	\$28.58

Type of Long Distance Calls:
 D - Dial Day - Full Rate
 E - Dial Evening - Discount Rate
 N - Dial Night - Discount Rate

Tax Code Explanation:
 01 - State and Local Tax Applied

THIS PORTION OF YOUR BILL IS PROVIDED AS A SERVICE TO
 DIAMOND COMMUNICATIONS. THERE IS NO CONNECTION BETWEEN
 DIAMOND COMMUNICATIONS AND U S WEST COMMUNICATIONS.

THESE CHARGES ARE FOR NON-COMMUNICATIONS SERVICES. NEITHER LOCAL NOR LONG DISTANCE SERVICES CAN BE DISCONNECTED FOR NONPAYMENT ALTHOUGH A 900 SERVICE PROVIDER MAY EMPLOY NON-CARRIERS TO SEEK TO COLLECT FOR PAY-PER-CALL CHARGES. PAY-PER-CALL BLOCKING IS AVAILABLE UPON REQUEST, WHERE TECHNICALLY FEASIBLE. ACCESS TO PAY-PER-CALL SERVICES MAY BE INVOLUNTARILY BLOCKED FOR FAILURE TO PAY LEGITIMATE CHARGES.

ITEMIZED CALLS

NO.	DATE	TIME	TO PLACE	TO AREA NUMBER	TYPE	MINUTES	AMOUNT
900/700 SERVICE							
1	Dec 06	4:53P	INFORMATION	900 765-6432	D	3	14.97
2	Dec 09	8:25P	PSYCHIC HELP	900 887-1234	N	18	89.82
3	Dec 10	11:20A	LIVETALK	900 342-1870	D	6	25.93
CLUB COMMUNICATIONS 900 SUBTOTAL OF ITEMIZED CALLS							\$130.72
CLUB COMMUNICATIONS 900 CURRENT CHARGES							\$130.72

Type of Long Distance Calls:

D - Day - Full Rate

N - Night - Discount Rate

THIS PORTION OF YOUR BILL IS PROVIDED AS A SERVICE TO CLUB COMMUNICATIONS 900. THERE IS NO CONNECTION BETWEEN CLUB COMMUNICATIONS 900 AND US WEST COMMUNICATIONS.

Western

U S WEST COMMUNICATIONS

http://www.uswest.com

WESLEY WESTERN
Bill Date: Dec 16, 1999
Account No: 206-965-3083-123 75

Balance Forward	New Charges	Total Amount Due	Due Date for New Charges
\$0.00	\$58.04	\$58.04	Jan 7, 2000

Account Summary

▼ Previous Balance

Charges		32.59
Payment	Nov 09	Thank you for your payment
Balance Forward		32.59
		\$0.00

▼ New Charges

U S WEST Communications	1-800-244-1111	27.21
Presubscribed Carrier Inc.	1-800-253-1289	11.48
Diamond Communications	1-800-678-1234	19.35
Total New Charges		\$58.04

TOTAL AMOUNT DUE **\$58.04**

We appreciate your business.

*The long distance company you have selected for calls outside your U S WEST Communications long distance area is Presubscribed Carrier Inc.
If this change has not been authorized call 1 800 922-1879.*

U S WEST COMMUNICATIONS

For questions, call 1 800 244-1111

Page 2

U S WEST Communications Local Charges

Monthly Charges

Charges from Minn dd to Minn dd

▼ Basic Services

These services are necessary for you to use your telephone.

Residence Line	12.00
Federal Access Charge	3.50

▼ Optional Services

These services are provided at your request and are not required as part of your basic telephone service.

Call Waiting	3.05
--------------	------

Total Monthly Charges

\$38.15

Order Activity

▼ Dec 01, 1999 Order Number C173618

Charge to Change Long Distance Company per Line	5.00
---	------

Total Order Activity

\$5.00

Taxes, Fees and

Surcharges Summary

Federal excise at 3%	.66
City Sales at 3%	.36
State 911 at \$.75 per access line	.75
Telephone Assistance Program at \$.25 per access line	.25

Total Taxes, Fees and Surcharges Summary

\$2.02

Total U S WEST Communications Local Charges

\$27.21

U S WEST Communications New Charges

\$27.21

U S WEST's automatic Payment Plan is dependable and convenient. It saves time and money! Sign up for this free service today! For more information please call 1-800-244-1111 for residential, or 1-800-803-600 for business.

NOV 13 '98 12:47PM US WEST

P.1/1

Long Distance	Date	Time	Place	Number	Type	Minutes	Amount
	1. Dec 05	8:51P	To OVERLNOPKKS	913 631 1133	E	3	.29
	2. Dec 10	11:21A	To ST LOUIS MO	314 862 8100	N	27	2.57
	3. Dec 12	5:02P	To LADUE MO	314 432 0280	E	28	2.60
	4. Dec 13	11:10A	To ST LOUIS MO	314 725 0433	O	3	.29
							5.81

Type of Call Codes:

D - Day

E - Evening

N - Night/Weekend

Total Diamond Communications Long Distance	61	\$5.81
--	----	--------

Miscellaneous Charges and Credits	No.	Date	Item	Tax Code	Amount
	5.	Dec 12	MONTHLY CHARGE	07	4.99

Tax Code Explanation:

07 - Tax Exempt

Diamond Communications Misc Charges and Credits	\$4.99
---	--------

Taxes, Fees and Surcharges Summary	Federal excise at 3%	.66
------------------------------------	----------------------	-----

Total Taxes, Fees and Surcharges Summary	\$0.66
--	--------

This portion of your bill is provided as a service to Presubscribed Carrier Inc.
There is no connection between U S WEST Communications and
Presubscribed Carrier Inc.

Long Distance	Date	Time	Place	Number	Type	Minutes	Amount
ABC TELEPHONE SERVICES							
	1. Dec 05	8:51P	To OVERLAND PARKS	913 831 1133	E	3	.29
	2. Dec 10	11:21A	To ST LOUIS MO	314 882 6108	N	27	2.57
PDQ PHONE SERVICE							
	3. Dec 03	12:55P	To ST LOUIS MO	314 725 0433	D	3	.29
	4. Dec 08	6:29P	To INDEPENDENCE MO	816 478 4565	E	37	3.52
	5. Dec 12	5:02P	To LAQUE MO	314 432 0280	E	28	2.68
	6. Dec 13	11:10A	To ST LOUIS MO	314 725 0433	D	3	.29
							9.62

Type of Call Codes:
 D - Day
 E - Evening
 N - Night/Weekend

Total Diamond Communications Long Distance	141	\$9.62
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Miscellaneous Charges and Credits	No.	Date	Item	Tax Code	Amount
	7.	Dec 09	MIN USE FEE	07	4.08
	8.	Dec 12	ABC TELEPHONE SERVICES		
			MONTHLY CHARGE	07	4.88
			PDQ PHONE SERVICE		

Tax Code Explanation:
 07 - Tax Exempt

Diamond Communications Misc Charges and Credits	\$8.96
--	---------------

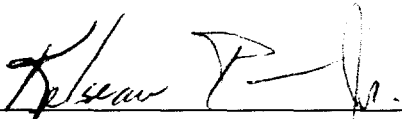
Taxes, Fees and Surcharges Summary	Federal excise at 3%	.68
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Total Taxes, Fees and Surcharges Summary	\$0.68
---	---------------

This portion of your bill is provided as a service to Diamond Communications.
 There is no connection between U S WEST Communications and
 Diamond Communications.

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 13th day of November, 1998, I have caused a copy of the foregoing **COMMENTS OF U S WEST COMMUNICATIONS, INC.** to be served, via hand delivery, upon the persons listed on the attached service list.



Kelseau Powe, Jr.

William E. Kennard
Federal Communications Commission
Room 814
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